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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Case No.
)	
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER
)	REGARDING ADDENDUM TO EXISTING
v.)	PROTECTIVE ORDER
)	
ROWLAND MARCUS ANDRADE,)	
)	
Defendant.)	
)	

It is hereby stipulated and agreed to by and between counsel for the United States and counsel for defendant Rowland Marcus Andrade (“Defendant”) that the parties hereby enter into the following

Addendum to the existing Protective Order, Dkt. #24. This Addendum applies only to the government's production of the affidavit in support of the search warrant for the search and seizure of items from the home of Maria Butina at 3617 38th Street, NW, Washington, D.C., 20016, on July 15, 2018 (the "Sealed Butina Affidavit"). All discovery produced by the government to date, and all future discovery produced moving forward, shall be governed by the existing Protective Order, which remains in full force and effect.

Rules for the Handling of the Sealed Butina Affidavit.

- a. **Limitations on Use.** Mr. Andrade and his legal team may use the Sealed Butina Affidavit solely in connection with the defense of this case, including any post-conviction or appellate litigation, or in "litigating related ancillary proceedings (including civil forfeiture actions and actions brought by the Securities and Exchange Commission, and any civil or criminal litigation concerning AML Bitcoin or to which Rowland Marcus Andrade or NAC Foundation, LLC is a party or witness)," ("ancillary cases") as permitted by the existing Protective Order governing discovery in this case. Dkt #124 at 3. Any and all counsel who will see, use, or discuss the contents of the Sealed Butina Affidavit must sign and comply with this Addendum and be bound by its terms.
- b. **Limitations on Dissemination.** Mr. Andrade, his legal defense team, and his ancillary counsel (collectively, "authorized persons") shall not copy or reproduce the Sealed Butina Affidavit except in order to provide copies of the document for use in connection with this case or any of Mr. Andrade's ancillary proceedings. Copies and reproductions, and any notes or records made in relation to the contents of the Sealed Butina Affidavit, are to be treated in the same manner as the original document.
- c. **Court Filings.** Absent prior agreement by the parties or permission from the Court, no party shall disclose the Sealed Butina Affidavit in any public filing with the Court. It shall be submitted under seal in accordance with Local Criminal Rule 49(f)(6). The Clerk of Court shall accept for filing under seal any filings made in compliance with that Rule and so marked by the parties pursuant to this Order.

1 d. **Court Hearings.** The restrictions in this Order shall not limit either party in the use
2 of the Sealed Butina Affidavit in judicial proceedings in this case or Mr. Andrade's
3 ancillary proceedings. The procedures for use of the Sealed Butina Affidavit during
4 any hearing or the trial of this matter shall be determined by the parties and the Court
5 in advance of the hearing or trial.

6 e. **Storage.** The Sealed Butina Affidavit must be maintained in the custody and control
7 of Mr. Andrade, the legal defense team, or Mr. Andrade's ancillary counsel.

8 This stipulation is without prejudice to either party applying to the Court to modify the terms of
9 any protective order. This Court shall retain jurisdiction to modify this Order upon motion of either
10 party even after the conclusion of district court proceedings in this case.

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12 **IT IS SO STIPULATED.**

ISMAIL J. RAMSEY
United States Attorney

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15 Dated: August 25, 2023

16 /s/
CHRISTIAAN H. HIGHSMITH
Assistant United States Attorney

17
18 /s/
MICHAEL J. SHEPARD
19 KERRIE C. DENT
20 CINDY A. DIAMOND
Counsel for Defendant
21 ROWLAND MARCUS ANDRADE
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[PROPOSED] ORDER

Pursuant to the foregoing stipulation of the parties and good cause having been shown, the Court hereby ORDERS that the foregoing stipulated Addendum to the Protective Order is in full force and effect.

IT IS SO ORDERED.

Dated: August __, 2023

HON. LAUREL BEELER
United States District Court Magistrate Judge

By signing below, I acknowledge that I have been provided and have reviewed a copy of this Order and hereby agree to be bound by its terms:

<u>SIGNATURE</u>	<u>DATE</u>
/s/ Kerrie C. Dent	8-25-23
/s/ Michael J. Shepard	8-25-23
/s/ Cindy A. Diamond	8-25-23
/s/ Rowland Marcus Andrade	8-25-23